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GLENN B. McCORMICK
Acting United States Attorney
District of Arizona

COLEEN SCHOCH
Assistant United States Attorney
Georgia State Bar No. 366545
Two Renaissance Square
40 N. Central Ave., Suite 1800
Phoenix, Arizona 85004
Telephone: 602-514-7500
Email: coleen.schoch@usdoj.gov
Attorneys for Plaintiff

REDACTED FOR
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Jorge Aguilera

Defendant.

No. CR-21-00744-PHX-DLR(MHB)

INDICTMENT

VIO: 18 U.S.C. § 924(a)(1)(A)
(False Statement During Purchase
of a Firearm)
Counts 1 – 38

18 U.S.C. §§ 924(d) and 981;
21 U.S.C. §§ 853 and 881; and
28 U.S.C. § 2461(c)
(Forfeiture Allegations)

THE GRAND JURY CHARGES:

COUNTS 1 – 38

From on or about September 10, 2020, through on or about June 16, 2021, in the District of Arizona, Defendant JORGE AGUILERA knowingly made false statements and representations to the businesses listed below, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each listed business, in that Defendant JORGE AGUILERA did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record on each of the approximate dates below, stating that he

(1) resided at the address listed on the Form 4473, when in truth and fact, he knew that he resided at a different address, and (2) was the actual transferee or buyer of the firearm, and was not buying the firearm on behalf of another person, whereas in truth and fact, he knew that he was buying the firearm on behalf of another:

Count	Date	Business Name	Business Location
1	September 10, 2020	Murphy's Gun Shop	Tucson, Arizona
2	October 7, 2020	C-A-L Ranch Stores	Casa Grande, Arizona
3	October 8, 2020	On Sight Shooting School	Casa Grande, Arizona
4	October 31, 2020	Arizona Firearms & Accessories	Tempe, Arizona
5	November 1, 2020	Healy	Tempe, Arizona
6	November 3, 2020	C-A-L Ranch Stores	Casa Grande, Arizona
7	November 3, 2020	On Sight Shooting School	Casa Grande, Arizona
8	November 22, 2020	Healy	Tempe, Arizona
9	November 22, 2020	Alpha Dog Firearms	Tempe, Arizona
10	November 23, 2020	On Sight Shooting School	Casa Grande, Arizona
11	November 23, 2020	C-A-L Ranch Stores	Casa Grande, Arizona
12	November 24, 2020	C-A-L Ranch Stores	Casa Grande, Arizona
13	December 18, 2020	C-A-L Ranch Stores	Casa Grande, Arizona
14	December 18, 2020	On Sight Shooting School	Casa Grande, Arizona
15	December 19, 2020	Tombstone Tactical	Phoenix, Arizona
16	December 20, 2020	AZ Guns	Chandler, Arizona
17	December 20, 2020	Guns Etc.	Mesa, Arizona
18	December 30, 2020	Alpha Dog Firearms	Tempe, Arizona
19	January 13, 2021	On Sight Shooting School	Casa Grande, Arizona
20	January 14, 2021	Legendary Guns	Phoenix, Arizona
21	January 15, 2021	Healy	Tempe, Arizona

Count	Date	Business Name	Business Location
22	January 15, 2021	Sportsman's Warehouse #139	Mesa, Arizona
23	January 16, 2021	C-A-L Ranch Stores	Casa Grande, Arizona
24	January 30, 2021	Randall's Sporting Goods	Glendale, Arizona
25	January 30, 2021	Shooters World	Phoenix, Arizona
26	March 25, 2021	Arizona Firearms & Accessories	Tempe, Arizona
27	March 25, 2021	ROE Armory	Glendale, Arizona
28	March 26, 2021	On Sight Shooting School	Casa Grande, Arizona
29	March 28, 2021	Mo Money Pawn Shop	Phoenix, Arizona
30	March 28, 2021	Healy	Tempe, Arizona
31	March 29, 2021	C-A-L Ranch Stores	Casa Grande, Arizona
32	May 3, 2021	Healy	Tempe, Arizona
33	May 3, 2021	Alpha Dog Firearms	Tempe, Arizona
34	May 5, 2021	Sportsman's Warehouse #132	Tucson, Arizona
35	May 6, 2021	Mo Money Pawn Shop	Phoenix, Arizona
36	May 6, 2021	Legendary Guns	Phoenix, Arizona
37	June 15, 2021	Guns Etc.	Mesa, Arizona
38	June 15, 2021	Mo Money Pawn Shop	Phoenix, Arizona

In violation of Title 18, United States Code, Section 924(a)(1)(A).

FORFEITURE ALLEGATIONS

The Grand Jury realleges and incorporates the allegations of Counts 1–38 of this Indictment, which is incorporated by reference as though fully set forth herein.

Pursuant to 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, and 28 U.S.C. § 2461(c), and upon conviction of the offenses alleged in Counts 1–38 of this Indictment, the defendant shall forfeit to the United States of America all right, title, and interest in (a) any property constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as the result of the offense, and (b) any of the defendant's property used, or

1 intended to be used, in any manner or part, to commit, or to facilitate the commission of,
2 such offense as to which property the defendants is liable. If any forfeitable property, as a
3 result of any act or omission of the defendant:

4 (1) cannot be located upon the exercise of due diligence,
5 (2) has been transferred or sold to, or deposited with, a third party,
6 (3) has been placed beyond the jurisdiction of the court,
7 (4) has been substantially diminished in value, or
8 (5) has been commingled with other property which cannot be divided without
9 difficulty,

10 it is the intent of the United States to seek forfeiture of any other property of said
11 defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C.
12 § 853(p).

13 All in accordance with 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, 28
14 U.S.C. § 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

15
16 A TRUE BILL

17
18 s/
FOREPERSON OF THE GRAND JURY
19 Date: September 14, 2021

20 GLENN B. McCORMICK
21 Acting United States Attorney
District of Arizona

22
23 s/
24 COLEEN SCHOCH
Assistant U.S. Attorney
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